

**UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF NEW YORK**

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Conflict International, Inc. and Conflict International  
Ltd.

Plaintiffs,

v.

Stephen Komorek and API International Consulting  
Group, Inc.,

Defendants.

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23-cv-2165 (ER)

**NOTICE OF MOTION FOR  
PRELIMINARY  
INJUNCTION AND  
TEMPORARY  
RESTRAINING ORDER**

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PLEASE TAKE NOTICE THAT:

Upon the Verified Complaint dated March 14, 2023, the exhibits annexed thereto, and upon the accompanying Memorandum of Law in Support of a preliminary injunction and temporary restraining order, the Petitioners will move this Court before the Honorable Edgardo Ramos, Courtroom 619, at the United States Courthouse, 40 Foley Square, in the City, County and State of New York, on the **15<sup>th</sup> day of March 2023** at 11:30 o'clock in the forenoon thereof, or as soon thereafter as counsel may be heard, for an Order pursuant to Rule 65(a) of the Federal Rules of Civil Procedure enjoining Respondents from violating the Non-Disclosure Agreement in any manner and from disclosing, divulging, furnishing, or making accessible to anyone confidential or proprietary information in their knowledge or possession.

PLEASE TAKE FURTHER NOTICE that the Petitioners also move this Court for an Order pursuant to Rule 65(b) of the Federal Rules of Civil Procedure that, pending the hearing and determination of the within motion for a Preliminary Injunction pursuant to Rule 65(a) of the Federal Rules of Civil Procedure, the Respondents from violating the Non-Disclosure Agreement

in any manner and from disclosing, divulging, furnishing, or making accessible to anyone confidential or proprietary information in their knowledge or possession.

Petitioners respectfully pray the Court issue the proposed Temporary Restraining Order attached pending the hearing and determination of the Motion for Preliminary Injunction.

Dated: 14th day of March, 2023  
New York, New York

Respectfully Submitted,

J. W. BEARDEN & ASSOCIATES, PLLC

/s/ Wes Bearden

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